IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

PALTALK HOLDINGS, INC.,

Plaintiff

vs.

No. 6:21-ev-00757-ADA

CISCO SYSTEMS, INC.,

Defendant.

S

JURY TRIAL DEMANDED

DECLARATION OF ELISE EDLIN IN SUPPORT OF DEFENDANT CISCO'S OPPOSITION TO PLAINTIFF'S *DAUBERT* MOTION TO EXCLUDE CERTAIN OPINIONS OF DEFENDANT'S DAMAGES EXPERT LAUREN KINDLER

- I, Elise Edlin, hereby declare as follows:
- 1. I make this declaration of my own personal knowledge, and if compelled to testify, I could and would competently testify thereto. I am an attorney at Perkins Coie LLP, counsel for Defendant Cisco Systems Inc. ("Cisco"). This declaration is submitted in support of Cisco's Opposition to Plaintiff's Daubert Motion to Exclude Certain Opinions of Defendant's Damages Expert Lauren Kindler.
- 2. Attached as **Exhibit A** is a true and correct copy of excerpts of the Lauren Kindler deposition transcript, dated November 15, 2022. This document is designated Restricted Outside Attorneys' Eyes Only.
- 3. Attached as **Exhibit B** is a true and correct copy of excerpts of the Amit Barave deposition transcript, dated October 11, 2022. This document is designated Restricted Outside Attorneys' Eyes Only.
- 4. Attached as **Exhibit C** is a true and correct copy of excerpts of a spreadsheet bearing Bates number CISCO-PAL-00003857. This document is designated Restricted Outside Attorneys' Eyes Only.

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5. Attached as Exhibit D is a true and correct copy of excerpts of a spreadsheet

bearing Bates number CISCO-PAL-00003132. This document is designated Restricted - Outside

Attorneys' Eyes Only.

6. Attached as Exhibit E is a true and correct copy of a letter from Doug Nolan

regarding Cisco's production number 21, dated October 11, 2022.

7. Attached as Exhibit F is a true and correct copy of an email chain with Amber

Magee regarding the Amit Barave deposition, dated October 6, 2022.

8. Attached as **Exhibit G** is a true and correct copy of excerpts of the Steven Boyles

deposition transcript, dated September 20, 2022. This document is designated Restricted - Outside

Attorneys' Eyes Only.

9. Attached as **Exhibit H** is a true and correct copy of excerpts of the Robert Hamilton

deposition transcript, dated September 22, 2022. This document is designated Restricted - Outside

Attorneys' Eyes Only.

10. Attached as **Exhibit I** is a true and correct copy of an email from Angela Griggs

regarding Cisco's document production 20, dated September 26, 2022

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true

and correct to the best of my current knowledge.

Executed this 15th day of December, 2022 in Oakland, California.

/s/ Elise Edlin
Elise Edlin

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